

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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AMPLIFY EDUCATION, INC.,	)	
	)	
Plaintiff-Counterclaim	)	
Defendant,	)	
v.	)	Civil Action No. 1:13-cv-02687-LTS-RLE
	)	
GREENWOOD PUBLISHING GROUP,	)	
INC. d/b/a HEINEMANN,	)	
	)	
Defendant-Counterclaim	)	
Plaintiff.	)	
	)	

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**JOINT CLAIM TERMS CHART PURSUANT TO LOCAL PATENT RULE 11**

Pursuant to Local Patent Rule 11 and the Court's Pre-Trial Scheduling Order (Dkt. 18), Plaintiff-Counterclaim Defendant, Amplify Education, Inc. ("Amplify") and Defendant-Counterclaim Plaintiff, Greenwood Publishing Group, Inc. d/b/a Heinemann ("Heinemann") hereby respectfully submit this "Joint Claim Terms Chart" for the Court's consideration.

Attached hereto as Exhibit A is Amplify's and Heinemann's proposed constructions for each of the patents-in-suit, U.S. Patent Nos. 7,114,126, 7,568,160, and 6,299,452 (collectively, the "Patents-in-Suit"), with cross-references to the invalidity and/or infringement contentions disclosures under Local Patent Rules 6 and 7.

Further, pursuant to Section 4 of the Pre-Trial Scheduling Order, the parties request that the Court schedule a *Markman* hearing to determine the appropriate construction for the claim terms listed in Exhibit A. The parties request that the Court allocate 2.5 hours for each party (five hours total) to present their respective constructions.

DATED: June 5, 2014

/s/ Karolina Jesien

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Respectfully submitted,

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